Response to Comments

The following comments to the pre-decisional EA for the Black Hills National Forest Noxious Weed Management Plan were evaluated and incorporated into the development of the Final environmental assessment and decision for the EA.

Where possible, comments were classified and grouped into similar categories of concern and addressed accordingly. In all cases, the Forest Service response is documented at the end of each comment category.

1. NOXIOUS WEED MANAGEMENT AND EDUCATION.

Comment 1:

Weston County Weed and Pest Management District, Dick Raburn, County Weed Manager, Newcastle, Wyoming:

I feel education of noxious weeds is an important step in implementation of the project, but education needs to start within your own agency. This includes wildland biologists, recreation personnel, engineering personnel, those that deal with mining, wildland/prescribed fire projects, grazing and logging practices. Once you get all of these different people understanding how noxious weeds effect their own entity, then go outside of your organization and educate private landowners, the various National Parks and Monuments, power companies that run lines through the Forest, permittees and those that have mining operations and special use permits, such as trail riders and outfitters and those running the logging operations in the Black Hills. Noxious weeds are spread and created from all functions and should be acknowledged as such.

Forest Service Response:

The Proposed Action (Noxious Weed Management Plan) provides for increased education and awareness of noxious weed management with Forest personnel through incorporation of weed management consideration in future Forest planning and project implementation (EA, Ch. II). By requiring district managers to consider noxious weed prevention and mitigation measure in the design of future Forest projects and programs, it is anticipated that Forest personnel will develop greater awareness and skills in managing noxious weeds in the future. In addition, the proposed weed plan requires Forest managers to take a "leadership role" in fostering noxious weed education and awareness with Forest stakeholders and the public, and provides for the development of a public education and awareness program to increase public knowledge and desire to contribute to noxious weed management in the Black Hills region (EA, Ch. II).

2. NOXIOUS WEED MITIGATION.

Comment 2:

Crook County Commissioners:

The "Forest Certified Weed Free Feed Order" and the "Certified Noxious Weed-Free Hay, Mulch, Straw, and Forage Order" are mentioned in the several different places in the Plan. Has this directive been developed into a specific order and where can the County access that information to better understand its requirements?

Forest Service Response:

The Black Hills Certified Weed-free Order regulating the requirement for State certified forages, hay, and mulch on all National Forest System Lands within the Black Hills Forest Boundary was issued by the Black Hills National Forest Supervisor in FY 2000. Discussion and disclosure of this order for both alternatives is identified in Chapters I, II, and IV of the EA and is included in the decision section. The special order was signed prior to the approval of this document. Copies of the Order, fact sheets discussing the requirements of the Order, and lists of certified vendors within the States of Wyoming and South Dakota are available to the public at any Forest Service Office within the Black Hills region. Copies of the order are also available at local feed stores within the Back Hills

Comment 62:

Black Hills Regional Multiple Use Coalition:

Would livestock producers on private ground within the forest be required to transport weed-free forage to their livestock?

Forest Service Response:

The Weed- Free Forage Order only applies to the Black Hills National Forest System Lands. The Forest Service has no authority on private land either inside or outside the boundaries of the national forest. The States of Wyoming and South Dakota may propose State laws to enforce weed free forage on private and State lands.

Comment 64:

Darlene Sears:

I can't see how it would help to quarantine the gravel. Is there really that much seed that would be in gravel used on Forest Service and County roads. Can it be scientifically and quantitavely assured that closing roads would stop the spread of weeds. Spearfish Canyon is a good paved road where much of the Tansy is located. If it is closed off seasonally would it really stop the spread of weeds? Likewise, same being true of people who use off highway.

Forest Service Response:

Gravel pits are a source of noxious weeds because the ground around the quarries where piles are located are usually heavily disturbed, allowing weeds from adjoining areas to spread and become established. If the piles remain in the same area and are not removed for use within the first year of stockpiling, weeds can be found. The piles need to be sprayed before removing them onto road surfaces. Any roads including roads surfaced with dirt, gravel or paved attract weeds from vehicles of all types. Tires are a well-known source of collecting weed seed in the treads and traveling long distances before being deposited along road edges and in the ditch lines. If Spearfish Canyon Road were closed, it would probably reduce the spread of noxious weeds but would be impractical to close because of public access needs.

Comment 3:

Crook County Commissioners, Sundance, Wyoming:

On page 37 of the proposed management plan, under "Prevention and Education" one of the preventative measures indicated is the washing of equipment in "areas infested with high densities of noxious weeds that are considered to be at high risk for spread, or priority management species". It is not clear what washing provisions will be required nor what measure of common sense and feasibility will be used in determining the establishment of that mitigation measure. There should be more specific information here to indicate how those considerations will be made. If equipment washing is going to be required, it is imperative that the Forest Service apply the policy across-the-board and even handedly to all applicable user situations, and not unfairly target any project or user group.

Forest Service Response:

The decision to implement this Forest Service contract provision will be at the discretion of District Rangers and the Forest Contracting Officers based on site-specific conditions of noxious weed infestation. While Forest managers consider the occurrence of these situations unique, requirements for equipment washing will be invoked wherever district managers determine risk of spread associated with equipment transfer to be unacceptably high. By using maps developed by each district, locations of heavy concentrations of noxious weeds will be known prior to timber sale contract awarding. In addition to possibly requiring washing of logging equipment, any Forest Service permittee in an area of heavy concentrations of noxious weeds is under the same requirements to stop the spread of noxious weeds.

Requiring the same provisions to the general public would be very difficult to enforce.

Comment 4:

Black Hills Forest Resources Association, Mary Flanderka, Representative:

Page 18 states, "Employ clauses for weed prevention in all forest contracts and permits as practical. In situations where Forest projects are scheduled to occur on areas infested with high densities of noxious weeds that are considered to be at high risk for spread, or priority management species, established provisions for equipment washing will re required to mitigate spread and establishment of noxious weeds to adjacent NFS lands and jurisdictions."

Although this paragraph provides latitude for common sense to be used, it also is vague enough to be interpreted for a stiff, regulative approach as well. The Black Hills Forest Resource Association is concerned about the increase in weed infestation acres and supports improved control of weeds, however, this paragraph should provide more detailed guidelines about when equipment washing would be required.

Black Hills Forest Resource Association would support the equipment washing requirement only if a) the noxious weeds are being contained through a comprehensive plan that addresses several potential weed transportation and eradication measures, and b) equipment washing requirements are applied fairly between all users, including the Forest Service, of a given area".

Forest Service Response:

The decision to implement this Forest Service contract provision will be at the discretion of District Rangers and the Forest Contracting Officers based on site-specific conditions of noxious weed infestation. While Forest managers consider the occurrence of these situations unique, requirements for equipment washing will be invoked wherever district managers determine risk of spread associated with equipment transfer to be unacceptably high. By using maps developed by each district, locations of heavy concentrations of noxious weeds will be known prior to timber sale contract awarding. In addition to possibly requiring washing of logging equipment, any Forest Service permittee in an area of heavy concentrations of noxious weeds is under the same requirements to stop the spread of noxious weeds.

Requiring the same provisions to the general public would be very difficult to enforce. The Forest will use a variety of methods to help reduce the transportation and eradication of noxious weeds through education programs, administrative and planning efforts and integrated control measures mentioned in the Decision Notice.

Comment 5:

Weston County Weed and Pest Management District; Dick Raburn, County Weed Manager; Newcastle, Wyoming:

#8. Mitigation Measures-Pages 22 and 23 ... #17-Livestock do not need to be held off treated areas. The grazing restrictions on the labels are for the number of days before slaughtering the animal and have no bearing on the treatment of the weeds. #19-

Different equipment requires different pressures. Do not limit yourselves. The use of anti-drift agents could be beneficial to your program. #21-I agree with notifying the public, but the posting of each individual treatment site could be cost prohibitive and time consuming. The Forest Service would also need to have a crew pick up signs after the weed management crew leaves the area.

Forest Service Response:

Mitigation measures 17 and 19 have been withdrawn from the proposed action. They had been incorporated in the pre-decisional EA, to mitigate potential harm to livestock from herbicide application and minimize drift of herbicide to non-target areas. The Forest evaluated this comment against E.P.A. approved label instructions and operating procedures incorporated in the weed plan. Based on this evaluation, the Forest determined that proper use of herbicide label instructions and rates prescribed for herbicides mitigated harmful effects to livestock. This conclusion was determined to apply to nozzle pressure as well. Moreover, the Forest agrees with commentor's assertion that restricting the use of nozzle pressure would unduly constrain Forest managers under certain conditions.

Comment 6:

Weston County Weed and Pest Management District; Dick Rabern, County Weed Manager; Newcastle, Wyoming:

Second, I feel the use of certified weed-free mulches, feeds and gravel products are also an important tool to keep noxious weeds from spreading. I would like to see skidders and project equipment washed before leaving an area infested with noxious weeds. Road maintenance equipment should also be washed and personnel trained on grading of roadways infested".

Forest Service Response:

The decision and attendant selected alternative in the project EA identify the issuance of a Forest Certified Weed-Free forage and mulch order in year 2000. The decision for this project includes provisions for equipment washing requirements to mitigate establishment and spread of noxious weeds in situations where Forest managers determine this measure to be warranted. These measures are discussed in the Decision Notice under “Elements of the Decision” and disclosed in detail in Chapters I and II of the EA.

Comment 7:

Alice Allen:

Many of the proposed mitigation measures have been used extensively for the past 5 years or so. However, the weeds are still spreading at astonishing rates. Why do we think that they are effective enough to control future infestations along with such a minimal level of treatment?

Forest Service Response:

Evaluations of treated weed infestation sites indicate that treatment is effective over time. I concur that new infestations and untreated sites are expanding at an unacceptable rate.

The rationale for proposing the BHNF Noxious Weed Management Plan is documented in the Purpose and Need for the Project (EA, Ch. I). This action is based on the consequences of the Forest's escalating noxious weed problem.

Several actions have taken place since the scoping was first done for the Weed Plan. A weed-free Order was put in place on the Forest and outfitter-guides are now encouraged to flush their horses with weed free forage for a minimum of 24 hours before bringing them onto the Forest. Changes in technology have also created more efficient spraying equipment and herbicides that are used now.

Post-project treatment of noxious weed infestation in timber sale areas, is normally terminated after five years, in compliance with Sale Area Improvement constraints - often with unacceptable levels of infestation remaining. The persistence of some weeds extends beyond five years. The Weed Plan is designed to improve noxious weed management on the Forest. Providing for continued treatment in timber management projects, as needed, will limit and contain infestations to acceptable levels.

The weed plan provides expanded responsibility to incorporate noxious weed management in all future projects and programs. It also provides flexibility for Forest managers to implement coordinated management with other agencies and private landowners on priority infestations outside scheduled project areas (EA, Ch. II). In addition, the weed plan provides for Integrated Pest Management more implementation of Integrated Pest Management on existing weed infestations prioritized for treatment. Proposed treatment includes an increase of 2,400 acres of annual treatment over current management (No Action alternative).

3. PROJECT PURPOSE AND NEED/PROPOSED ACTION.

Comment #8:

Weston County Weed and Pest Management District; Dick Rabern, County Weed Manager; Newcastle, Wyoming:

2. Integrated Control -Page 3..... I would like to see an "Integrated Approach" used throughout the document in treatment situations, so as not to limit your employees' methods of treatments in various situations.

Forest Service Response:

The original draft document included the term “Integrated control” in more than one context. It represented both interagency cooperation and Integrated Pest Management (IPM) This confusion has now been resolved (refer to the Glossary). The BHNF Weed plan provides for implementation of Integrated Pest

Management to treat and control priority noxious weed infestations Forest-wide (EA, Ch. II, Features Common to Both Alternatives).

Comment 8a:

Weston County Weed & Pest Control District:

Proposed Action-Pages 1 and 2 .....How did the Forest come up with approximately 887,000 acres of proposed infestations over the next decade, when 82,000 acres have been inventoried to date? What type of formula was used to come up with this average?

Forest Service Response:

Acres of existing and future predicted weed infestations were based on inventory (82,000 acres), and proposed project analysis areas (887,000 acres). Based on comments relative to the accounting of these acreages, the Forest re-evaluated the Purpose and Need for the final EA, and clarified predicted infestations based on infestation rates and weed mitigation associated with scheduled Forest activities. The infestation rates used in this determination were derived from the BHNF Forest Plan FEIS (pg. III-189 - 200), technical reports in the Project planning record, and research analyses pertinent to this project (EA, Ch. VI - Bibliography). In addition, the Forest inventory of existing noxious weed infestation was re-evaluated against mapping standards (EA, Ch. II) and integrated control (EA, Ch. II) for management.

Both existing and predicted infestations in need of management relative to the Purpose and Need for the final EA have been reduced; including 82,000 acres of existing infestation mapped and inventoried, and approximately 22,300 acres of future infestation predicted to, occur in the absence of improved management. Based on predicted infestation rates and expected control associated with scheduled activities (in lieu of project analysis areas), Forest managers estimate that implementation of the proposed action can meet project objectives over the next 10 years.

Comment 9:

Alice Allen:

The Proposed Action is not likely to achieve the desired results of control of noxious weeds. Statements in the EA to that effect are not supported by any analysis nor are they supported by common sense. The entire analysis is made suspect by the unsupported number of projected infestations over the next decade (887,000 acres). This number is nearly 80% of the forest! There is no way that treating 6,000 acres/year for 10 years will control this amount of projected new infestations. Either the projected number of new infestation acres is incorrect or the assumptions regarding the effectiveness of treating 6,000 acs. are incorrect. There is something seriously wrong with this entire analysis. The Forest Plan FEIS contains an entirely different estimate of the number of acres of future infestations! Yet this analysis claims to be tiered to the FEIS. Did anyone out there read the FEIS??

Forest Service Response:

Acres of existing and future predicted weed infestations were based on inventory (82,000 acres), and proposed project analysis areas (887,000 acres). Based on comments relative to the accounting of these acreages, the Forest re-evaluated the Purpose and Need for the final EA, and clarified predicted infestations based on infestation rates and weed mitigation associated with scheduled Forest activities. The infestation rates used in this determination were derived from the BHNF Forest Plan FEIS (pg. III-189 - 200), technical reports in the Project planning record, and research analyses pertinent to this project (EA, Ch. VI - Bibliography). In addition, the Forest inventory of existing noxious weed infestation was re-evaluated against mapping standards (EA, Ch. II) and integrated control (EA, Ch. II) for management.

Both existing and predicted infestations in need of management relative to the Purpose and Need for the final EA have been reduced; including 82,000 acres of existing infestation mapped and inventoried, and approximately 22,300 acres of future infestation predicted to, occur in the absence of improved management. Based on predicted infestation rates and expected control associated with scheduled activities (in lieu of project analysis areas), Forest managers estimate that implementation of the proposed action can meet project objectives over the next 10 years.

Comment 10:

Crook County Weed and Pest District, Dick Sackett, Supervisor:

You speak of treating 6,000 acres per year, which is a substantial increase from what has been treated in the past, but is it enough? 6,000 acres is only about 7% of the 82,000 infested acres. At that rate it will take 14 years to treat the acres present in the BHNF today. I am not sure that is enough to meet your goal "the goal is net reduction in infested acres from FY 2001 and beyond;"

Forest Service Response:

Acres of existing and future predicted weed infestations were based on inventory (82,000 acres), and proposed project analysis areas (887,000 acres). Based on comments relative to the accounting of these acreages, the Forest re-evaluated the Purpose and Need for the final EA, and clarified predicted infestations based on infestation rates and weed mitigation associated with scheduled Forest activities. The infestation rates used in this determination were derived from the BHNF Forest Plan FEIS (pg. III-189 - 200), technical reports in the Project planning record, and research analyses pertinent to this project (EA, Ch. VI - Bibliography). In addition, the Forest inventory of existing noxious weed infestation was re-evaluated against mapping standards (EA - Ch. II) and integrated control (EA, Ch. II) for management.

Both existing and predicted infestations in need of management relative to the Purpose and Need for the final EA have been reduced; including 82,000 acres of existing infestation mapped and inventoried, and approximately 22,300 acres of

future infestation predicted to, occur in the absence of improved management. Based on predicted infestation rates and expected control associated with scheduled activities (in lieu of project analysis areas), Forest managers estimate that implementation of the proposed action can meet project objectives over the next 10 years.

Comment 11:

Angela Neville:

It does not seem clear to me how you came up with the 887,000 acres of noxious weeds that will be found in the Black Hills in 5 to 10 years. This number seems ill conceived and there is no analysis available in the document that supports this statement. In addition, it was not clear that this is the estimated if the no action would be chosen or if the alternative 2 would be chosen. There was no numbers presented that stated how much noxious weeds would spread in the second alternative. It seems to me that this number is unreasonably high(over 2/3rds of the forest on every acre) would be impacted. Wouldn't this start to affect the timber growth on the Black Hills?

Forest Service Response:

Acres of existing and future predicted weed infestations were based on inventory (82,000 acres), and proposed project analysis areas (887,000 acres). Based on comments relative to the accounting of these acreages, the Forest re-evaluated the Purpose and Need for the final EA, and clarified predicted infestations based on infestation rates and weed mitigation associated with scheduled Forest activities. The infestation rates used in this determination were derived from the BHNF Forest Plan FEIS (pg. III-189 - 200), technical reports in the Project planning record, and research analyses pertinent to this project (EA, Ch. VI - Bibliography). In addition, the Forest inventory of existing noxious weed infestation was re-evaluated against mapping standards (EA, Ch. II) and integrated control (EA, Ch. II) for management.

Both existing and predicted infestations in need of management relative to the Purpose and Need for the final EA have been reduced; including 82,000 acres of existing infestation mapped and inventoried, and approximately 22,300 acres of future infestation predicted to, occur in the absence of improved management. Based on predicted infestation rates and expected control associated with scheduled activities (in lieu of project analysis areas), Forest managers estimate that implementation of the proposed action can meet project objectives over the next 10 years.

Comment 12:

Weston County Weed and Pest Management District; Dick Rabern, County Weed Manager; Newcastle, Wyoming:

I am interested in knowing how the calculations were done for the additional 200,000 acres of noxious weeds predicted for the year 2010? If the Forest is currently treating 3,000 of 82,000 acres, how will your weed managers keep up with the increase of these

additional acres?..7. Proposed Action-Page 18..."What is an additional 3,000 acres of treatment going to accomplish on your current 82,000 acres of infestation?"

Forest Service Response:

Acres of existing and future predicted weed infestations were based on inventory (82,000 acres), and proposed project analysis areas (887,000 acres). Based on comments relative to the accounting of these acreages, the Forest re-evaluated the Purpose and Need for the final EA, and clarified predicted infestations based on infestation rates and weed mitigation associated with scheduled Forest activities. The infestation rates used in this determination were derived from the BHNF Forest Plan FEIS (pg. III-189 - 200), technical reports in the Project planning record, and research analyses pertinent to this project (EA, Ch. VI - Bibliography). In addition, the Forest inventory of existing noxious weed infestation was re-evaluated against mapping standards (EA, Ch. II) and integrated control (EA, Ch. II) for management.

Both existing and predicted infestations in need of management relative to the Purpose and Need for the final EA have been reduced; including 82,000 acres of existing infestation mapped and inventoried, and approximately 22,300 acres of future infestation predicted to, occur in the absence of improved management. Based on predicted infestation rates and expected control associated with scheduled activities (in lieu of project analysis areas), Forest managers estimate that implementation of the proposed action can meet project objectives over the next 10 years.

4. IMPLICATIONS OF THE PROPOSED ACTION ON COOPERATIVE MANAGEMENT.

Comment 13 :

Crook County Commissioners, Sundance, Wyoming:

Crook County views cooperation as the key to making the proposed comprehensive weed management effort possible. Annual Operating Instructions and/or Memorandums of Understanding (MOU's) between the Forest Service and affected land users and jurisdictions should provide an effective means of defining and facilitating a productive level of cooperation. The plan to leverage addition funding through "participating counties, state, agencies/organizations, and grants" makes sense only in the entities have formally agreed, in writing, to cooperate in the management plan at the levels indicated.

Forest Service Response:

The BHNF has taken an "everybody's backyard approach" toward developing the Forest Noxious Weed Management Plan (Proposed Action). To this end, development of Cooperative Agreements with all Forest stakeholders, including county agencies, is considered critical toward obtaining effective weed management. While county cooperation in the implementation of the Forest Weed Plan is voluntary, it is the Forest's position that county commitment to the development and implementation of cooperative grants, agreements, and operating plans is in the best interest of all participating stakeholders.

Comment 14:

Crook County Weed and Pest Control District, Sundance, Wyoming (Dick Sackett, Supervisor):

When you mention "Leverage funds where possible with participating counties, states," again, what is meant by the word leverage and how does that pertain to Crook County?

Forest Service Response:

In order to effectively implement interagency management strategies of the BHNF Weed Plan, the Forest, along with participating stakeholders will need to pool resources, work cooperatively, develop weed districts and move funds across jurisdictional boundaries where feasible. This cooperation has been occurring with Black Hills county agencies over the past decade. The objective of the Proposed Action is to increase this cooperation with all Forest stakeholders and foster leadership toward the development of funding to facilitate effective weed treatment. See previous comment.

Comment 15:

Wesley W. Thompson:

I apologize for not commenting on the BHNF Noxious Weed management plan, and to tell you the truth, I am about burned out on weeds. Short of pressure washing every tire and hoof crossing forest service boundaries and declaring all out war on weeds, control would be all that could be hoped for and that may not be cost effective..... I would like to suggest addressing invasive native species which are taking over much of the understory and meadows in the Black Hills in this plan. I would hope administrative boundaries (state line, county lines, forest boundaries and district boundaries) would not leave any land not to be covered. Adjacent private land must also be addressed in this plan.

Forest Service Response:

The Forest Service agrees. See previous comments.

5. PROJECT CONSIDERATION OF WILDLIFE IMPACTS ON SPREAD AND ESTABLISHMENT OF NOXIOUS WEEDS.

Comment 16:

Donavan Nicholas:

Did not find any responsibility given to the wildlife for spreading the weeds, did see several areas where livestock was blamed for spreading seeds and trampling area that ultimately are weed infested. Within plan I see no mention as to how you will deal with the state game and fish department in their responsibility for the spreading of the weeds. I believe that wildlife of all kinds lead to major weed infestations not just livestock as detailed in the plan, also timber sales.

Forest Service Response:

Forest managers acknowledge wildlife as a source of noxious weed establishment and spread; however, documentation of these infestations is not well known but is considered negligible (EA, Ch III). As part of the Proposed Action, the Forest will enter into cooperative agreements and plans with Forest stakeholders, including State agencies where appropriate to achieve the objectives of the BHNF Weed Plan (EA, Ch. I). During implementation of the Weed Plan, the Forest will coordinate with these agencies annually to meet Forest noxious weed management objectives.

6. FOREST PROGRAM FUNDING FOR NOXIOUS WEED MANAGEMENT AND USE OF TIMBER SALE IMPROVEMENT FUNDS.

Comment 17:

Donavan Nicholas:

There needs to be a fund established from sale revenue for weed control out side of the much misused KV funds. The total amount that is allocated to treat weeds over the next ten years in inadequate, however it's a start.

Forest Service Response:

The Knutson-Vandenberg (KV) Act established funding from USDA Forest Service timber sale receipts to facilitate re-forestation and implementation of resource improvement projects within timber sale areas where warranted. As part of the BHNF Weed Plan, the Forest intends to use K.V. funding as a supplement to an appropriated noxious weed program. Under the Weed Plan, the Forest will increase treatment as funding from Congress permits.

Comment 66:

Donavon Nicholas:

Where will the weed treatment dollars be coming from? How many dollars actually get to the ground to treat weeds?

Forest Service Response:

Noxious weed treatment funding comes from many sources – appropriated funds designated directly for weed treatment; funding provided by other resources within the Forest Service such as timber, range, wildlife, engineering, recreation and fire management. The sale of timber also provides for support to treat weeds once the harvesting is completed.

On the Black Hills National Forest, an estimated 75% of all funding for weed treatment reaches the ground for application, monitoring and mapping of both existing weed locations and ones where we anticipate new weed infestations because of ground disturbance.

7. DEVELOPMENT OF ALTERNATIVES.

Comment 18:

Wesley W. Thompson:

I am sure you will have a no action alternative that will project what uncontrolled noxious weeds would mean.

Forest Service Response:

A detailed description of the alternatives considered and analyzed for the EA are contained in Chapter II - Alternatives Including the Proposed Action. This section includes a discussion of a No Action (current management) Alternative. A disclosure of the effects and consequences of implementing the No Action alternative are discussed for relevant resource management activities in Chapter IV - Environmental Consequences. A No Action – discontinue treatment of noxious weeds was eliminated from detailed study because it would violate Forest Service and Agency direction and was considered outside the discretion of the Forest Service to implement and will not meet project objectives (EA, Ch. II).

Comment 19:

Angela Neville:

There did not seem to be a range of alternatives. I find it hard to believe that there is no other option than to treat with chemicals on 82,000 acres. What about preventing the spread during other activities, such as not over grazing an area, seeding disturbed areas, preventing more road construction/reconstruction, etc. What if we don't want our ground water quality affected by so much chemicals especially in the Madison aquifer.

Forest Service Response:

The Proposed Action (Weed Plan) was developed from interdisciplinary determination that the most effective treatment and management of noxious weeds are based on a combination of Integrated Pest Management measures, including: mechanical, herbicides, and bio-control agents including livestock. Alternatives that proposed singular use of these control measures were considered and dismissed from detail study based on this assessment (EA, Ch. II - Alternatives Considered but Eliminated From Detailed Study). The Proposed Action includes provisions to increase treatment in association with future increases in program funding (EA, Chapter IV- Economics). The environmental impacts associated with implementation of both the No Action and Proposed Action alternatives are discussed for affected resources in Chapter IV - Environmental Consequences of the EA.

The process for determining significant issues to the Proposed Action is discussed in Chapter I - Identification of Issues of the EA. This section of the EA also summarizes the categories of public comments/concerns to the Proposed Action that were received during public scoping. Significant issues are developed from

the identification of resource effects that cannot be resolved through implementation of management activities, mitigation, or operating procedures incorporated in the Proposed Action (EA, Ch. I). Interdisciplinary review of public and agency comments determined that there were no resource issues or public concerns that could not be resolved or mitigated through design of the Proposed Action (Weed Plan).

Chapter II- Alternatives Including the Proposed Action (EA, Ch. II) discusses the process for developing alternatives, along with a discussion of the full range of alternatives considered and analyzed for the EA. Alternatives to the Proposed Action are developed to address significant issues (points of unresolved conflict resulting from implementation of the Proposed Action) and project objectives. Since no significant issues to the Proposed Action were identified for the project, only the No Action and Proposed Action were analyzed in detail for the project (EA, Ch. II).

Comment 20:

Alice A Allen:

The EA failed to consider a reasonable range of alternatives to achieve the purpose and need, i.e. control of noxious weeds. [It]..was determined that there were no significant issues but no list of concerns is provided and no rationale provided for why no comments were considered significant. This could be assumed to arbitrary and capricious. One alternative not considered in detail was "Increased Treatment". Reasons for not considering this alternative are not sound. Funding levels are not an appropriate NEPA criteria. Another alternative could identify additional control treatments and opportunities for looking for additional funding. The sooner we establish control the lower the long term costs are going to be.

Forest Service Response:

The Proposed Action (Weed Plan) was developed from interdisciplinary determination that the most effective treatment and management of noxious weeds are based on a combination of Integrated Pest Management measures, including: mechanical, herbicides, and bio-control agents including livestock. Alternatives that proposed singular use of these control measures were considered and dismissed from detail study based on this assessment (EA, Ch. II - Alternatives Considered but Eliminated From Detailed Study). The Proposed Action includes provisions to increase treatment in association with future increases in program funding (EA, Chapter IV- Economics). The environmental impacts associated with implementation of both the No Action and Proposed Action alternatives are discussed for affected resources in Chapter IV - Environmental Consequences of the EA.

The process for determining significant issues to the Proposed Action is discussed in Chapter I - Identification of Issues of the EA. This section of the EA also summarizes the categories of public comments/concerns to the Proposed Action that were received during public scoping. Significant issues are developed from the identification of resource effects that cannot be resolved through

implementation of management activities, mitigation, or operating procedures incorporated in the Proposed Action (EA, Ch. I). Interdisciplinary review of public and agency comments determined that there were no resource issues or public concerns that could not be resolved or mitigated through design of the Proposed Action (Weed Plan).

Chapter II- Alternatives Including the Proposed Action (EA, Ch. II) discusses the process for developing alternatives, along with a discussion of the full range of alternatives considered and analyzed for the EA. Alternatives to the Proposed Action are developed to address significant issues (points of unresolved conflict resulting from implementation of the Proposed Action) and project objectives. Since no significant issues to the Proposed Action were identified for the project, only the No Action and Proposed Action were analyzed in detail for the project (EA, Ch. II).

8. IDENTIFICATION OF ISSUES.

Comment 21:

Angela Neville:

I feel that your document has not address most of the significant issues such as water quality, plant diversity and the long term affects to wildlife"

Forest Service Response:

The process used to identify and develop significant issues is documented in the EA in Chapter I – Identification of Issues. For this project, the IDT identified no significant issues to the proposed action. The analysis and disclosure of environmental impacts anticipated through implementation of the preferred alternative and decision for water quality, and plant and animal diversity are disclosed in Chapter IV of the EA (Environmental Effects) and the attendant project B.A./B.E. (Appendix C). The U.S. Fish and Wildlife Service has reviewed the B.A./B.E. and concurred with findings and conclusions relative to the anticipated impacts of this decision.

9. DEVELOPMENT AND DESIGN OF THE PROPOSED ACTION.

Comment 22:

Weston County Weed and Pest District , Richard R.Rabern, District Supervisor:

6. Page 12 ...." Why emphasize bio-control over herbicide application, when both are beneficial? I do not feel that we can rely on one or the other alone".

Forest Service Response:

The BHNF Weed Plan implements noxious weed standards and guidelines incorporated in the Revised Forest Plan (1997) on a site-specific basis. Guideline 4302 (pg. II-59 of the Forest Plan) emphasizes use of "...biological control

methods whenever practical, and whenever protecting other resources is desired". Accordingly, the BHNF Weed plan provides for implementation of this direction in situations where protection of sensitive resources (including sensitive plant populations and water quality) is warranted (See Sensitive Plant Management, EA, Ch. IV). Moreover, the BHNF Weed plan provides for use of all relevant Integrated Pest Management methods, including herbicide application, in situations where weed plan objectives can be met while providing for adequate resource protection (see Chapter II, Description of Alternatives including Features Common to Both Alternatives).

Comment 23:

Angela Neville:

Why does the forest plan only treat this much not any more? Will a change to the Forest Plan be necessary? What was wrong with the Forest Plan analysis? Where would the funding come from to complete the second alternative? Are you "counting on the come" to prevent significant effects to wildlife and plant communities. There did not appear to have a goal set on how many acres of noxious weeds you wanted in 10 years (decrease in acres I hope).

Forest Service Response:

The BHNF Forest Plan identified two budget levels for attainment of resource management goals and objectives; including, full (where all goals and objectives would be met), and reduced (80 percent accomplishment of goals and objectives). For noxious weed management, the Forest planned for approximately 3,600 acres of annual noxious weed control under full funding to meet Forest Plan direction.

Forest Plan direction is implemented at the project level through site-specific analyses and decisions. During this process recommendations for revisions to Forest Plan direction may be made. While the BHNF Weed plan provides for a 2,400-acre increase in annual noxious weed treatment above Forest plan treatment outputs, the EA did not identify a need to revise any Forest management direction identified in the Forest Plan. The proposed increase in treatment is intended to augment projected treatment outputs identified in the Forest Plan FEIS. Based on these findings, a revision to Forest Plan direction for noxious weed management is not anticipated.

Funding levels and program costs associated with implementation of both alternatives are discussed in the Economics section of the EA (see Chapter IV).

See EA Ch. II under Monitoring and Project Measurement Indicators, for Forest response to attainment of project objectives.

Comment 24:

Homestake Mining Corporation, Jim Wainwright:

Neither option approaches the annual number acres needed to effectively address the

problem.

Neither the language of the EA or the options, as a part of, outlines an effective strategic plan.

Suggest an overall review of timber activities (harvesting and thinning) that would develop guidelines to discourage the introduction and spread of noxious weeds. These guidelines would then be incorporated into individual project planning.

Area by area infestations are discussed, but no mention of a strategy the incorporates a drainage-by-drainage basic strategy by noxious weed species, control, or coordinated efforts.

No discussion or recommendations addressing any motorized recreational vehicle use.

Forest Service Response:

The number of acres stated initially has been revised since comments were received. The number was revised downward from 887,000 to 96,250. Both existing and predicted infestations in need of management have been reduced; including 82,000 acres of existing infestation mapped and inventoried, and approximately 22,300 acres of future infestation predicted to occur in the absence of improved management. Based on predicted infestation rates and expected control associated with scheduled activities (in lieu of project analysis areas), Forest managers estimate that implementation of the proposed action can meet project objectives over the next 10 years.

This document is intended to look at options for reducing noxious weeds on the Black Hills National Forest. It provides overall guidance but specific site/weed strategies are to be determined on a site-by-site basis by each District Range Staff.

Informal reviews of Forest Program activities have been completed in an effort to recommend guidelines that will reduce noxious weed impacts to the Forest. Guidelines have been recommended to discourage the introduction and spread of noxious weeds and will be incorporated into individual project planning. These guidelines come from the Forest Plan, Rocky Mountain Region Noxious Weed Management Strategy, and also from State Guidelines for South Dakota and Wyoming. These guidelines reflect emphasis on prevention, education, administration, inventory, mapping and monitoring.

The Noxious Weed EA is a programmatic document and is not intended to be site specific or on a drainage-by-drainage basis. Treatment strategies and coordinated efforts vary by ranger district.

There is no discussion of treatment relating to motorized recreational vehicle use at this time. No recommendations were forthcoming in the comments from the Forest Recreation Staff. Due to the impossibility of monitoring/tracking individual vehicles such as ATV's, motorcycles, go-carts and other off-road vehicles by the general public, they were not considered to be an effective way to stop the spread of noxious weeds.

10. ANALYSIS OF ECONOMIC IMPACTS

Comment 25:

Angela Neville:

There was not an economic analysis done for either alternative that incorporated the cost of planning, organizing with State and county organizations, public meetings, costs of chemicals, cost of monitoring, cost of biological control etc."

Forest Service Response:

A discussion of relevant economic costs and valuations associated with both the No Action and Proposed Action alternatives is included in the - Economics' section of the EA Chapter IV. This discussion of predicted costs and benefits associated with implementation of either alternative is in compliance with Forest Service direction. Funding originates from appropriated dollars and each resource (Forest Management Activity) allocates portions of their funding to weed management.

Comment 26:

Alice Allen:

"There is no economic analysis which looks at which alternatives might provide better long term cost efficiency vs. short term costs. FS Manual direction requires an economic efficiency analysis!!"

Forest Service Response:

A discussion of relevant economic costs and valuations associated with both the No Action and Proposed Action alternatives is included in the - Economics' section of the EA Chapter IV. This discussion of predicted costs and benefits associated with implementation of either alternative is in compliance with Forest Service direction. Funding originates from appropriated dollars and each resource (Forest Management Activity) allocates portions of their funding to weed management.

Comment 27:

Crook county Weed and Pest Control District, Dick Sackett, Supervisor:

What is meant when you say "Establish multi-financing from all Forest management activities"?

The term multi-financing is used in the Plan and my question is where does the money for this fund originate?

Forest Service Response:

A discussion of relevant economic costs and valuations associated with both the

No Action and Proposed Action alternatives is included in the - Economics' section of the EA Chapter IV. This discussion of predicted costs and benefits associated with implementation of either alternative is in compliance with Forest Service direction. Funding originates from appropriated dollars and each resource (Forest Management Activity) allocates portions of their funding to weed management.

Comment 68:

Boyd Larson:

Would it be more economical to contract spray?

Forest Service Response:

Contract spraying can be more economical if the contractors are dependable and follow all contract specifications. If the Forest Service has to constantly watch contractors meet their requirements, then the cost goes up and becomes comparable to what it cost the Forest Service to treat weeds. In areas where sensitive plants and/or their habitats exist, it is cheaper in the long run to have the Forest Service crews spray for noxious weeds. Contractors tend to have a difficult time spending the money necessary to send their employees to training to identify critical ecosystems.

Comment 70:

South Dakota Trail Riders:

We will be anxious to know how funding for this proposal will be met. Is there a funding campaign by the Forest Service that the public can be involved in? What point is there in having a plan, but no way to implement it?

Forest Service Response:

Noxious weed treatment funding comes from many sources – appropriated funds designated directly for weed treatment; funding provided by other resources within the Forest Service such as timber, range, wildlife, engineering, recreation and fire management. The sale of timber also provides for support to treat weeds once the harvesting is completed

The public can support the Forest Service efforts by helping to reduce the establishment of weeds on their own property and thus stop the spreading of weeds onto the national forest. They can also stop the spread by not bringing weeds on to the forest by using weed-free hay, cleaning their vehicles, including their tires before leaving main paved roads and venturing onto the forest. By following these kinds of preventive measures, they are helping the Forest Service reduce spending and concentrating on areas that are difficult to treat.

The plan will be implemented but it is not known how successful it will be without constant funding from Congress and the Forest Service. We need

additional funding and support from both the public and people within our agency to maintain a steady and increasing flow of funding to the ground level to get the treatment accomplished

11. INTERDISCIPLINARY INVOLVEMENT IN THE DEVELOPMENT OF THE EA

Comment 28:

Alice Allen:

The IDT was NOT interdisciplinary. The Wildlife Biologist was never consulted nor had any input to this analysis. Nor were timber interests represented.

Forest Service Response:

The BHNF Weed Plan (EA) was prepared under an interdisciplinary review and analysis process. Chapter V - Consultation and Coordination contains a list of Forest personnel and individuals involved in the preparation of the EA. The project planning record for the EA contains additional technical documents and project initiation direction from the Decision-Maker relative to interdisciplinary review of the project.

12. PROJECT MONITORING AND EVALUATION

Comment 29:

Alice Allen:

"Monitoring is an important component of the proposed action yet there is no objective level identified. Monitoring is not any good if you have no target objective to measure against. Is our objective to reduce infestations by 10%, 25%, and 50% by the end of the decade. What good is monitoring if we don't have any idea of what our goal is??"

Forest Service Response:

Project measurement indicators designed to enable Forest managers to evaluate the effectiveness of the BHNF Weed Plan are identified and discussed in Chapter II - Comparison of Alternatives. These indicators provide for assessment of Weed Plan effectiveness against the project goal of long-term net reduction in priority weed infestations. At this time, Forest managers cannot accurately quantify the goal of net reduction by percentage. During the process of Weed Plan implementation and monitoring, Forest managers will clarify this goal through project assessment and inventory.

Project inventory protocols provide for monitoring and inventory in conjunction with application of Integrated Pest Management methods.

Comment 30:

Weston County Weed and Pest District, Richard R.Rabern, District Supervisor:

3. Inventory/Mapping/Monitoring-Page 4..." I also feel mapping is important, but it should be done while treating infestations. There are more dollars spent on mapping infestations than are spent in treating them, which still allows the infestations to remain and spread."

Forest Service Response:

Project measurement indicators designed to enable Forest managers to evaluate the effectiveness of the BHNF Weed Plan are identified and discussed in Chapter II - Comparison of Alternatives. These indicators provide for assessment of Weed Plan effectiveness against the project goal of long-term net reduction in priority weed infestations. At this time, Forest managers cannot accurately quantify the goal of net reduction by percentage. During the process of Weed Plan implementation and monitoring, Forest managers will clarify this goal through project assessment and inventory.

Project inventory protocols provide for monitoring and inventory in conjunction with application of Integrated Pest Management methods.

13. PROJECT SCOPING AND PUBLIC INVOLVEMENT.

Comment 31:

Alice Allen:

The scoping was inadequate. The scoping list and draft EA mailing list failed to include obviously interested parties such as most of the range permittees on the Forest, South Dakota Game, Fish and Parks at Rapid City, Custer State Park and representatives of the timber industry (affected by mitigation measures). There was no list of specific scoping comments nor responses.

Forest Service Response:

Chapter I - Public Review and Comment (EA), discusses the scoping process employed for the development of the alternatives to the Proposed Action and pre-decisional EA. Included in this section is a discussion of an additional 30-day comment period used by the Forest to provide additional time for public and agency input toward the development of the BHNF Weed Plan, based on district request.

A summary of public issues to the Proposed Action are included in the Identification of Issues section of the EA, and a complete listing of public comments to the pre-decisional EA are included in this appendix of the document.

As part of the scoping process, input toward the BHNF Weed Plan was solicited from all Forest livestock grazing permittees, in addition to agency stakeholders. Formal comment received on this project is included in this section of the document.

14. HERBICIDE USE.

Comment 32:

Weston County Weed and Pest Control District, Richard R.Rabern, District Supervisor:

11. Appendix B-Page 65 I noticed the use of Tordon 22K, Banvel plus 2,4-D listed on many species of weeds. Be aware, that in other circumstances, there are many other herbicides that could be utilized for a more cost-effective treatment.

Forest Service Response:

The Decision and selected alternative for this project prescribe the use of E.P.A. approved herbicides for use in noxious weed treatment on National Forest Systems lands within the Forest boundary. To this end, all herbicides approved for such use will be considered and used by Forest managers as warranted, and not limited to any specific herbicide. This provision is identified and discussed in the EA for the selected alternative in Chapters I, II, and IV.

Comment 61:

Ellen Reddick:

Page 22 –17 – What herbicides and what treatments are they used for, that they would require a withdrawal period?

Forest Service Response:

In Appendix B is a list of the noxious weed species and the herbicides that we use to treat them. The withdrawal period is determined by the manufactures depending on the contents of the chemicals and how they interact with the environment and animals.

Comment 65:

Terry Schmitz:

Why not contract spray?

Forest Service response:

The Forest Service currently uses contractors to help spray noxious weeds on the Forest. The contractors are both county weed crews and private contractors that bid on contracts. It is estimated that 35% of the spraying is completed under contract.

15. ANALYSIS OF EFFECTS.

Comment 33:

Angela Neville:

There was no indication of what the current practices of treating 3,000 acres would achieve in the future.

The Analysis of effects seemed to be missing for all resources, especially on sensitive plants and wildlife. How can you make a determination if a BE is not completed.

Forest Service Response:

A B.A./B.E. for Threatened, Endangered, and Sensitive animal and plant species was prepared for this decision/E.A. and is included in Appendix C of the EA.

Based on comments to the draft EA, the environmental impact section (Ch. IV), and Comparison of Alternatives section (Ch. II) were revised to better clarify anticipated impacts of the project and the benefits of expanded treatment for the preferred alternative.

16. NOXIOUS WEED CONSIDERATION WITH LAND EXCHANGES.

Comment 34:

Weston County Weed & Pest Control District (Richard R.Rabern, District Supervisor):

10. Forest Service Land Exchanges-Page 35. Make sure land being acquired by the Forest Service is not going to be a financial burden to your plan.

Forest Service Response:

The decision and attendant EA (Chapters II and IV – Land Exchanges) address application of the Weed Plan relative land acquisition and exchanges. In all cases, incorporation of noxious weed risk and evaluation assessments prior to Forest approval of land acquisitions are anticipated to mitigate unacceptable long-term treatment costs to the tax payer relative to noxious weed management.

17. GENERAL COMMENTS AND REQUESTS RELATIVE TO THE FOREST NOXIOUS WEED MANAGEMENT PROGRAM.

Comment 35:

Lawrence County Weed and Pest Board:

The Lawrence County Weed and Pest Board urges an immediate development and implementation of coordinated noxious weed management program along the 20 mile Spearfish Canyon scenic byway and Spearfish creek. The National Forest must take leadership and develop cooperators including Lawrence County, State Department of Transportation, State Department of Game Fish and Parks, and Canyon owners."

Forest Service Response:

The decision and attendant EA for the Black Hills National Forest Noxious Weed Management Plan include long-term comprehensive program management elements and strategies that meet project objectives for prevention and control of noxious weeds over the coming decade on the Black Hills Forest. Site-specific analysis, application, and disclosure of these management elements are disclosed to the best extent possible based on the best information of Forest managers and County Weed cooperators at this time. The Decision, along with Chapters I, II, and IV of the EA contained clarified disclosure of the Weed Plan based on comments received to the draft EA.

Comment 36:

Lawrence County Weed and Pest Board:

Letter of December 13, 1999 to Greg Mast, LA Agriculture Representative John Thune

The Board of Directors of the Lawrence County Weed & Pest Board and the Commissioners of Lawrence County request a dialogue with you to present and discuss the inadequate funding to manage the escalating spread of noxious weeds on public lands of the National Forest. The County has called noxious weed infestation the greatest environmental threat to the citizens of Lawrence County.

To bring this environmental issue to the forefront of public attention and policy, we need to build a "grass-roots" consortium of counties and states to develop a three-prong strategic approach. Your input is greatly needed in this regard.

The strategy is in three parts. First, a direct appeal by South Dakota Secretary of Ag to US Interior and Agriculture for short-term funding. Secretary Cruea has agreed. Second, possible litigation by a consortium of states against the United States to compel long-term funding as may be required under public law. We are currently exploring legal standings. Third, Congressional hearings leading to effective public law to facilitate long-term funding. Public Laws 93-629, 101-624, and 90-585 and South Dakota Codified Law, Title 38 may not be sufficient to achieve this policy goal.

Weeds know no political or social boundaries. While society debates, the weeds continue their relentless sprawl. Is this not a public health, safety, and welfare issue to the Nation and its productive and rich bio-diversity landscape?

Forest Service Response:

The decision and attendant EA for the Black Hills National Forest Noxious Weed Management Plan include long-term comprehensive program management elements and strategies that meet project objectives for prevention and control of noxious weeds over the coming decade on the Black Hills Forest. Site-specific analysis, application, and disclosure of these management elements are disclosed to the best extent possible based on the best information of Forest managers and County Weed cooperators at this time. The Decision, along with Chapters I, II, and IV of the EA contained clarified disclosure of the Weed Plan based on comments received to the draft EA.

Comment 37:

Office of Federal Land Policy, State of Wyoming:

The State of Wyoming supports Alternative 2, the proposed Action. We would also suggest the BHNF work with WDA to expand the list of noxious weeds in Table I-1 on page 7, to incorporate additional species designated in Wyoming.

Forest Service Response:

The decision and attendant EA for the Black Hills National Forest Noxious Weed Management Plan include long-term comprehensive program management elements and strategies that meet project objectives for prevention and control of noxious weeds over the coming decade on the Black Hills Forest. Site-specific analysis, application, and disclosure of these management elements are disclosed to the best extent possible based on the best information of Forest managers and County Weed cooperators at this time. The Decision, along with Chapters I, II, and IV of the EA contained clarified disclosure of the Weed Plan based on comments received to the draft EA. The list of noxious weeds in Table I-1 includes plants located in both South Dakota and Wyoming that currently exist on the Black Hills National Forest.

Comment 38:

Wyoming Department of Agriculture, Roy Riechenbach, Director, Noxious Weed Management:

Existing Memoranda of Understanding and other working agreements with individual agencies remain in place and unaffected.

Alternative 2, the Proposed Action, should be the preferred alternative. It effectively increases management activity to levels that will keep up with the annual increase in current infestations and possible allow for some decrease in infestation in the long run. It also will allow the Forest to come into line with the President's new emphasis on invasive species as noted by his executive order of 1998.

This plan contains many modern concepts such as integrated pest management, which includes education, prevention, and biological, mechanical, cultural and chemical controls. Cooperation and partnerships are stressed. Integrating weed management activities into the multi-faceted activities on the forest and leveraging funding from those activities is an excellent use of limited budgets.

Rapid response and early detection are a part of this plan. Will they be using a list of regional species for their detection, or will they just use the two state weed lists and the federal weed list? A broader regional list would be better from a preventative view.

The plan stresses revegetation as part of the mitigation for various projects on the forest. but there was no mention of revegetation with competitive grasses in areas of severe infestation after control measures were performed and the area is devoid of vegetation. This is a key part of control in these instances.

The proposed plan is to increase acreage by 3,000 per year under current funding. If additional funding comes down through the system, as a result of the executive order and the increased emphasis on invasives, will they be able to increase acres treated under this proposal, or will they have to through the process again? This plan should be flexible enough to allow increases in acreage if money is available. Sometimes, they have to act quicker than the NEPA process allows.

The inventory and mapping strategy looks very good.

On page twelve, they say they want to emphasize biocontrol over herbicides. A true IPM program does not emphasize one component over another; it uses each component in the areas that are best suited for its application and where it will be most efficient and economical. In many cases, biocontrol is not the most efficient and economical way to proceed.

The plan considered a wide range of control and prevention measures which will make a good IPM program.

We believe the BHNF officials have prepared a well-written plan; and we appreciate the opportunity to comment and offer our recommendations to make a well-written plan even better.

Forest Service Response:

The noxious weeds currently known to be on the Black Hills National Forest can be found on South Dakota, Wyoming and regional lists. As new weeds are found, they will be added to the list of noxious weeds that will be treated.

Once infestations have been treated, native species of desirable perennial plants will be established (Decision Notice – Mitigation Measure #5).

The Forest Service and its cooperators will treat additional acres should additional funding become available (Decision Notice – Administration and Planning).

All types of treatments will be used to control and eradicate noxious weeds. No one type of control will be emphasized over another except where one would work better in the environment where the weeds occur (Decision Notice – Integrated Control, page 4).

Comment 39

Weston County Weed & Pest Control District

In conclusion, I have noticed the use of a "Risk Assessment" listed throughout the document. What is a risk assessment and what does it consist of

Forest Service Response:

Risk Assessment is conducted to determine what human health risks and what risks of effects to non-target species are posed by potential exposure to herbicides. The risk assessment includes an analysis of a range of possible exposures to

herbicides – from those exposures most likely to occur to those that are extremely unlikely (Risk Assessment for Herbicide Use in Forest Service Regions 1,2,3,4, and 10 and on Bonneville Power Administration Sites, September 1992).

Comment 40:

Lawrence County Commissioners:

In evaluating this document we found very few specifics that would constitute a weed plan. The scoping document that was released last spring had several specific areas and plans for those areas. This EA mentions those areas but does not go into detail as to what they are going to do about them.

The EA does call for the treatment of 6000 acres of weeds annually. At some point we would like to know how they are going to treat those areas. They do discuss that some will be treated chemically, some biologically, and some mechanically. They don't say how much of each or under which conditions each method will be used. The EA does say that guidelines developed through this document will be written into timber sale contracts and allotment management plans through Best Management Plans (BMP). While this step may be necessary to satisfy government red tape, it makes it difficult for us non-professional document readers to figure out what exactly they are going to do about the weed epidemic.

Forest Service Response:

The decision and attendant EA for the Black Hills National Forest Noxious Weed Management Plan include long-term comprehensive program management elements and strategies that meet project objectives for prevention and control of noxious weeds over the coming decade on the Black Hills Forest. Site-specific analysis, application, and disclosure of these management elements are disclosed to the extent possible based on the best information of Forest managers at this time. The Decision, along with Chapters I, II, and IV of the EA contained clarified disclosure of the Weed Plan based on comments received to the draft EA.

Comment 41:

Lawrence County Commissioners and Lawrence County Weed & Pest Board:

The Forest service allowed the weed problem to get to this degree and they should be responsible for cleaning up the problem and not pass the responsibility onto someone else.

We are glad to see the Forest Service is continuing to address the weed problem and hope this all leads to fewer weeds in the forest in the future.

The Lawrence County Weed & Pest Board support the alternative 2, proposed action that doubles the previous 3000, to 6000, acres of noxious weed treatment on the National Forest. However, the Board believes alternative 2 will not cause a net reduction of noxious weed infestation on the National Forest.

The Lawrence County Weed & Pest Board believes the National Forest is severely deficient in noxious weed management. Proposed funding of "program" weed management on National Forest must be substantially increased $300,000 annually over an extended period of time. Additionally the Forest must use "all" available KV funds to treat noxious weed infestations on timber-impacted areas.

The Lawrence County Weed & Pest Board supports the use of aquatic safe herbicides in riparian areas.

The Lawrence County Weed & Pest Board supports the Forest in establishing provisions in equipment washing, implementation of certified weed free mulch, straw, forage restrictions and required use of certified noxious weed-free seed.

The Lawrence County Weed & Pest Board recommends the Forest thoughtfully and carefully reduce motorized travel on roads through highly infested noxious weed areas during the vulnerable spring season, and thoughtfully and carefully restrict motorized off-road travel in highly infested noxious weed areas containing Leafy Spurge, Tansy, and St. Johnswort for a "sunrise/sunset time certain period". Such a period of time could extend 10 years.

The Lawrence County Weed & Pest Board believes the Forest must adopt "Eradication" as a management goal for well defined and currently confined noxious weeds like Leafy Spurge, Tansy, St. Johnswort and Spotted Knapweed. Historically, "control" as a management goal continues to fail in the management of noxious weeds. "Eradication" is a reasonable expectation if sufficient and adequate funding is available to the National Forest. "Control" as a management goal is considered the most costly, environmentally detrimental, and most vulnerable to failure because the term of commitment and resources are in perpetuity.

Forest Service Response:

The decision and attendant EA (Chapter I – Treatment Priority), provide for eradication of High priority noxious weeds within the Forest boundary where appropriate and feasible. Based on analysis and review of relevant scientific literature on noxious weed control measures, the project IDT determined that broad scale eradication of noxious weeds could not be economically or managerially attained for the project (Chapters II and IV; Comparison of Alternatives and Environmental Consequences respectively.)

There is no discussion of treatment relating to motorized recreational vehicle use at this time. No recommendations were forthcoming in the comments from the Forest Recreation Staff. Due to the impossibility of monitoring/tracking individual vehicles such as ATV's, motorcycles, go-carts and other off-road vehicles by the general public, they were not considered to be an effective way to stop the spread of noxious weeds.

Comment 42:

Ellen Reddick:

How will weed districts be established, what employee(s) will supervise the districts and how will they be funded?

Forest Service Response:

Weed Districts will be established through cooperative efforts of landowners County weed supervisors, State Department of Agricultural personnel and interested publics. Weed Management District participation by the Forest Service will be at the discretion of the District Rangers in accordance with approved agreements and Memorandum's of Understanding (MOU). Forest Service funds that may be used will be from the appropriated Forest funding for Noxious Weed Management.

Comment 43:

Ellen Reddick:

New highly undesirable species invading the forest for the first time need to be controlled with herbicides.

Pages 3, 6,8,10,17,19,20,24,27,41,42,47 present conflicting statements on the number of acres to be treated/retreated. These numbers need to match and be stated in the same term (i.e. acres treated per year) throughout the EA.

Forest Service Response:

Acres of existing and future predicted weed infestations were based on inventory (82,000 acres), and proposed project analysis areas (887,000 acres). Based on comments relative to the accounting of these acreages, the Forest re-evaluated the Purpose and Need for the final EA, and clarified predicted infestations based on infestation rates and weed mitigation associated with scheduled Forest activities. The infestation rates used in this determination were derived from the BHNF Forest Plan FEIS (pg. III-189 - 200), technical reports in the Project planning record, and research analyses pertinent to this project (EA, Ch. VI - Bibliography). In addition, the Forest inventory of existing noxious weed infestation was re-evaluated against mapping standards (EA, Ch. II) and integrated control (EA, Ch. II) for management.

Both existing and predicted infestations in need of management relative to the Purpose and Need for the final EA have been reduced; including 82,000 acres of existing infestation mapped and inventoried, and approximately 22,300 acres of future infestation predicted to, occur in the absence of improved management. Based on predicted infestation rates and expected control associated with scheduled activities (in lieu of project analysis areas), Forest managers estimate that implementation of the proposed action can meet project objectives over the next 10 years.

Comment 44:

Ellen Reddick:

Page 6-1. It would be nice to have stated in one place exactly what your goals, objectives, standards and guideline are or have them referenced in the EA as to where we would have access to this information.

Forest Service Response:

Project objectives, Guidelines, and standards for the Decision are discussed and disclosed in the following sections of the supporting EA: Chapter I (Relevant Direction Pertinent to the Analysis) Chapter II (Proposed Action and attendant Management Features) and Appendix B – USDA Noxious Weed Best Management Practices for Noxious Weed Prevention and Control.

Comment 45:

Ellen Reddick:

Page 15 Aerial Spraying- This needs to be considered as a viable control method where adequate control and mitigation for human health concerns could be attained.

Forest Service Response:

Aerial spraying as an option for Forest treatment is addressed in Chapter II of the EA – Alternatives considered but eliminated from detailed consideration.

Comment 46:

Ellen Reddick:

Page 16-Mechanical/Biological controls - If we are going to move ahead in the war on weeds, biocontrol must be an integral part of your weed control plan, one staff person on the forest who coordinates the biocontrol programs would be very beneficial. Someone trained in site selection, release procedures, monitoring, collection and releasing of bios, like bugs, would greatly improve the effectiveness of releases since the initial cost of bugs is high. Herbicide treatment, however, needs to remain an integral part of your plan, especially in controlling new invasions and highly aggressive weeds.

Page 16- Increased Treatment- Due to the explosive expansion of weeds, seeking increases in weed control funding should be a high priority. Also weed control should be a higher priority in timber, livestock, recreational and other use plans.

Page 18 - Prevention and Education - An I & E program is very important for successful implementation of your plan. What are your BMP's to mitigate establishment and spread of noxious weeds?

Forest Service Response:

Integrated Pest Management is an integral part of this Weed Plan. See Chapter II – Features of the Proposed Action. Each district has a weed coordinator, trained to monitor, collect and release insects and also knowledge to keep an effective herbicide program operational.

The Weed Plan allows for funding from any source to help treat more weeds than the expected funding currently planned to treat 6,000 acres (Decision Notice – Administration and Planning). Weed treatment is a high priority among all resource groups with supportive funding becoming available (Decision Notice – Prevention and Education).

The Best Management Practices (BMPs) needed to mitigate establishment and spread of noxious weeds are those that reduce or eliminate soil erosion and allow retention of soils in their present location. The practices will allow revegetation with certified noxious weed free seed mixtures and require mitigation for treatment of noxious weeds in project design, permits and annual operating instructions for a variety of projects (Minerals Exploration and Extraction, Chapter III Affected Environment). Best Management Practices are also listed in Appendix B.

Comment 47:

Ellen Reddick:

Page 19-1. - New invasions need to be treated with herbicides and monitored in a timely manner to prevent establishment. 2. -Treatment of small scattered existing highly invasive weeds by mechanical treatments will be a waste of your time and money.

Page 21- Inventory/mapping/monitoring - You can run your wheels off doing this and not get any weeds controlled. Inventory and mapping should coincide with other duties and personnel could be trained to GIS weeds as part of timber management, road and prescribed fire projects, allotment and recreation plans and during mineral exploration. Monitoring should be timely after weeds have been controlled or bios are implemented.

Page 21 - Mitigation 1. - It would be nice to know what the guidelines are. If they are too extensive to include you could reference where we would have access to that information.

Forest Service Response:

See Appendix B – USDA Forest Service Noxious Weed Prevention and Control Guidelines and Best Management Practices. Copies of the R2 Noxious Weed Handbook are incorporated in the Planning record and available upon request.

Comment 48:

Ellen Reddick:

Page 22-4. - The use of only mechanical or biological controls on wilderness areas sets those areas up for a disaster. Invasive weeds such as leafy spurge, Canada thistle and knapweeds are not effectively controlled by mechanical means. These weeds can create monocultures that have little or no use even for wildlife. A noxious weed must be established in a large area before insect biocontrol agents can be used. This allows large areas to become probable contamination zones that will have economic effects on adjacent lands. Limiting herbicide use to the prevention of SIGNIFICANT LOSSES on resource values on adjacent lands is totally irresponsible. Management decisions that

create losses are not sound management decisions. Wick applicators, backpack and hand sprayers can be used for herbicide treatments in motorized restricted areas. I would be totally against the development of new wilderness areas if you adhere to this policy.

Forest Service Response:

The decision and selected alternative in the EA require the Forest to address and manage noxious weed treatment in the Black Elk Wilderness area according to R2 Policies and Procedures. Both these policies and the Black Hills Forest Plan provide for appropriate use of all treatment options included in the decision – including herbicides where field managers determine this option to be necessary.

Comment 49:

Ellen Reddick:

Page 23-20 - Wick applicators and hand sprayers can be used effectively to selectively control noxious weeds with herbicides.

Page 23 - Monitoring - Please don't let the red tape overload the system so the actual control of weeds does not get done.

Page 25 - Projects - The noxious weed plan should be implemented on a forest-wide basis not on a project basis so weeds can be controlled outside project areas.

Forest Service Response:

See EA (Chapter I Proposed Action and Purpose and Need) and attendant Decision Notice. The decision and selected alternative prescribe a comprehensive Forest-wide strategy for treatment and management of noxious weeds within the Forest. In addition, the decision and EA provide for project specific evaluation and implementation of management elements to meet project objectives for the Forest.

Comment 50:

Ellen Reddick:

Page 26 - Does the public have access to your R-2 Noxious Weed management strategy or your forest hazardous material spill plan?

Forest Service Response:

A Copy of the R2 Noxious Weed Management Strategy is included in the project planning record and incorporated in the preferred alternative (Chapter I and II) and implementing decision for this project. Copies of the document can be obtained upon request from the Forest. The Hazardous Materials Spill Plan has not been completed and the Forest relies on the "Environmental Assessment and Management (TEAM) Guide for South Dakota and Wyoming" found in Chapter VI – Bibliography.

Comment 51:

Ellen Reddick:

Page 30 - I could find little information on what your risk assessments will entail. If the turn around time between the risk assessment and control is very lengthy you will nullify the effectiveness of your entire plan. New invasions of highly undesirable species may need to be controlled immediately, especially if the plants are in the seed stage. Your employees are or should be adequately trained to assess situations and act without a lot of red tape.

Forest Service Response:

See Appendix B – USFS Forest Service Best Management Practices of the EA. These risk assessments and Best Management Prevention Practices are designed to be implemented by the Forest, where appropriate, to achieve desired project objectives in a timely manner.

Risk Assessment is the determination of the most likely locations where noxious weeds will occur as a result of management activities and the implementation of projects.

Comment 52:

Ellen Reddick:

Page 32 - Table III -1- Forest Service employees I have talked to, say, "they feel the mapped infestations are only 60 to 70 percent complete, therefore your acres of infestations would be low. Consequently the funds needed and the acres needing treatment would be low also.

Forest Service Response:

Noxious Weed treatment projection incorporated in the decision and attendant EA are based on the best available existing inventory of noxious weeds and projected infestations within the Forest boundary as estimated from Forest, State, and County agencies at the time of decision. While the EA acknowledges the limitations of known and projected infestation data, the increased treatment levels incorporated in the decision are designed to adjust to developing treatment needs subject to updated inventory information and congressional funding (note Proposed Action, Chapter I – treatment of 6,000 acres).

Comment 53:

Ellen Reddick:

Page 33 - Paragraph 2 - Soil disturbance is indeed the major cause of noxious weed establishment. Therefore reseeding with competitive plant species should be incorporated into any management plan where soil disturbance occurs, reseeding should be done soon after any disturbance.

Forest Service Response:

I concur with your recommendation. This is part of the Integrated Pest Management scheme. It is not currently practiced in all ground disturbing activities but is recommended.

Comment 54:

Ellen Reddick:

Page 35-Forest land Exchanges - A noxious weed inventory should be done before any land exchange takes place. The exchange value should reflect the extent of the noxious weed infestations. Land with extensive weed infestations should not be exchanged.

Forest Service Response:

Chapter II – Features common to alternatives, Chapter IV- Environmental Consequences of Land Exchanges, and the project decision include provisions for risk and inventory evaluation for noxious weeds as part of all Forest Land Exchange approvals.

Comment 55:

Ellen Reddick:

Page 40 - Effects - Paragraph 1 - Please continue to use a multiple control approach with noxious weeds. When properly used, control methods can be used in many different situations.

Page 43-Fisheries/Riparian - I hope you will continue to regard properly applied herbicides labeled for riparian areas on a par with biological controls.

Page 45 - Range - Properly managed range reduces weed infestations. For range to be properly managed, fencing is needed to provide rotational grazing, improvements are needed to distribute grazing and annual monitoring is needed to determine proper stocking rates.

Page 47-Economics - I applaud your proposed increase in additional funding that can be implemented forest wide. It is needed and necessary.

Page 65-Appendix B - It would be beneficial if you would include the operating procedures for all of your listed targeted weed species. Field bindweed, common mullein, perennial pepperweed, common tansy, skeleton leaf bursage, yellow starthistle, dyers wood, houndstongue and salt cedar are targeted species not included in appendix B. Diffuse knapweed, burdock, perennial sowthistle and horsenettle are not targeted species but are included in Appendix B. It would be nice to know which of your targeted species are priority weeds to be controlled and under what conditions are infestations prioritized, density, size of infestation, location, etc.?

Forest Service Response:

The decision and attendant EA incorporated direction requiring field managers to use only E.P.A. approved herbicides for treating noxious weeds on National Forest System Lands within the Forest boundary. Moreover, this direction requires managers to follow all application label instructions and operating procedures for these chemical as required project mitigation (Chapter II – Mitigation Measures). Operating and label instructions for approved herbicides are included in the application records for each Forest district and can be obtained upon request.

A detailed list of targeted weeds species and prioritization criteria for treatment are identified in the EA; Chapter I – Target Weed Species; Chapter II – Integrated Pest Management Strategies and Appendix B – Herbicide/Biological Control Operating Procedures for Treatment of Target Weed Species.

Comment 56:

Lawrence County Weed & Pest Board:

"Is this not a public health, safety, and welfare issue to the Nation and its productive and rich bio-diversity landscape?

Forest Service Response:

Although this document does not cover the entire nation or wide scale landscapes, it does provide direction for improved productivity of the native ecosystem within the boundaries of the Black Hills National Forest. The Weed Management Plan deals with prevention, control and eradication of noxious weeds over the landscape. Treatment of weeds is not a public health, safety or welfare issue (Chapter IV – Environmental Effects) but no action will indirectly play a role in: public health – lack of productive vegetation allowing bare soils and dust in the area: safety – effects on livestock for food production by what the livestock digest; and welfare – reducing jobs that rely on areas encumbered with weeds rather than productive vegetation.

Comment 57:

Weston County Weed & Pest Control Board and Ellen Reddick:

What is the Region 2 noxious weed management strategy?

Forest Service Response:

Region 2 Noxious Weed Management strategies are found in the Decision Notice under Regional Policy and Direction. There are three objectives and under the Strategy Elements section in the Decision Notice, are the main elements that will also direct the Black Hills Weed Management Plan.

Comment 58:

Weston County Weed & Pest Control District:

Is the Black Hills National Forest Supervisor trained and educated enough to make the decisions that are listed?

Forest Service Response:

The Black Hills National Forest Supervisor relies upon his staff and noxious weed specialists on the Forest, Regional Office and Washington Office and with support of cooperating agencies to provide him with the most accurate and detailed knowledge available to make the decisions required within the Weed E.A. and Weed Management Plan. No one person has all the training and education that would be needed to encompass the broad spectrum of noxious weed management.

Comment 59:

Weston County Weed & Pest Control District and Ellen Reddick:

The plan states that we have an annual precipitation of 134 inches on surrounding plains, to about 28 inches at higher elevations. Is this correct?

Forest Service Response:

These figures were not accurate and have been removed from the final EA

Comment 60:

Wyoming Department of Agriculture:

Early detection of new invaders is not mentioned in the plan. It is suggested that a more regional approach with a regional list to look for in the field.

Forest Service Response:

Early detection is in the document but not stated in the same terms. In the Decision Notice under Prevention and Education are many proposed ways to detect spread of noxious weeds. Species of noxious weeds that the Black Hills National Forest recognizes are those considered to be noxious in the States of Wyoming and South Dakota. The list can be found in Chapter I of the EA under Forest Noxious Weeds Targeted for management.

Comment 63:

Vern and Bonnie Vigoren:

What % kill did the operator get? What % burn of slash was accomplished and who was responsible?

Forest Service Response:

These questions are very difficult to answer because we have no way of knowing in what context they were asked. I will generalize my answers to what I think the questions are asking. The percentage of noxious weeds killed is based on

application rates and the number of years of treatment. The normal interval of years of spraying is 5 to 8 years to get 90% to 100% eradication. This is by following the herbicide company label directions. Burn piles of slash usually result in 85% on average removal of all woody materials in consumption down to ashes. The Forest Service is responsible for burning most of the slash piles on the Forest but does allow timber companies to do the work under direct supervision of the Forest Service.

Comment 67:

Chuck Nicholas:

Why is not the SD department of Game, Fish, and Parks involved in the weed treatment plan?

Forest Service Response:

The South Dakota Department of Game, Fish and Parks are involved as a cooperator in the reduction of noxious weeds within the Black Hills National Forest and also on State and private lands. Their field crews notify the Forest Service when they discover weed infestations. The Forest Service works directly with other State agencies (State Cooperative Extension Specialists and State Weed Boards) that deal directly with weeds and in turn these agencies work with State Game, Fish and parks.

Comment 69:

Bill Lei:

Increasing problem with daisy growth and why is this not considered a noxious weed?

Forest Service Response:

In contacting the local county weed agencies, the only daisy on the noxious weed list is the Oxeye Daisy, Chrysanthemum leucanthemum L. that is on the Region 2 list, but not on the State or county listings. The States of Colorado, Ohio, Washington and Wyoming are the only States that have the Oxeye Daisy on their respective noxious weed list. The Common Sunflower, Helianthus annuus L., is native to North America and is common along roadsides, fencerows and waste areas. This may be the plant you are concerned with having treated. The county does not spray them. The Forest Service will spray them if they distract from the general area, such as in recreation sites and blocking viewpoints. It really is not a problem in the hills. If you want the State of South Dakota to add the daisy as a noxious weed, you need to contact Pennington County Weed Extension. The State will not add another plant to its list until a plant on their list is removed.